

1 The Law Offices of Barrett S. Litt  
2 617 South Olive Street, Suite 1000  
3 Los Angeles, California 90014  
4 (213) 623-7511

5 Attorneys for Intervenor

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7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF LOS ANGELES

10  
11 CHURCH OF SCIENTOLOGY )  
12 OF CALIFORNIA, )

13 Plaintiff, )

14 GERALD ARMSTRONG, DOES  
15 1 through 10, inclusive, )

16 Defendants. )

17 MARY SUE HUBBARD, )

18 Intervenor. )

No. C420153

ITEMIZED LIST OF  
SPECIAL DAMAGES AND  
DEMAND FOR SETTLEMENT  
TO DEFENDANT GERALD  
ARMSTRONG FROM PLAINTIFF  
CHURCH OF SCIENTOLOGY OF  
OF CALIFORNIA AND INTER-  
VENOR MARY SUE HUBBARD.

19 TO DEFENDANT, GERALD ARMSTRONG, AND HIS ATTORNEY OF  
20 RECORD:

21 Plaintiff Church of Scientology of California and  
22 intervenor Mary Sue Hubbard, pursuant to the Trial Setting  
23 Conference Order in the above-entitled matter, list the  
24 following special damages:

25 i. Church of Scientology of California:

- 26 (a) Compensation for staff time expended in pursuit of  
27 the property converted by defendant Armstrong --  
28 \$11,000;

1 (b) Fees of private investigator -- \$91,000

2 2. Mary Sue Hubbard: None.

3 Plaintiff Church of Scientology of California and  
4 intervenor Mary Sue Hubbard, pursuant to the above-mentioned  
5 Trial Setting Conference Order and Code of Civil Procedure  
6 §998 and Civil Code §3291, hereby demand that defendant,  
7 Gerald Armstrong, agree to settlement of the above-entitled  
8 matter on the following terms and conditions:

9 (1) That judgment be taken against defendant Gerald  
10 Armstrong in favor of plaintiff Church of Scientology of  
11 California, in the amount of \$50,000.

12 (2) That judgment be taken against defendant Gerald  
13 Armstrong in favor of intervenor Mary Sue Hubbard, in the  
14 amount of \$25,000;

15 (3) That the judgment against defendant Gerald  
16 Armstrong include a permanent injunction returning the  
17 documents currently under seal by the Clerk of the Superior  
18 Court to the Church of Scientology of California and the  
19 other relief requested in the joint motion for partial  
20 summary judgment;

21 (4) That plaintiff Church of Scientology of  
22 California, intervenor Mary Sue Hubbard, and defendant  
23 Gerald Armstrong agree to mutual releases of all claims  
24 against each other.

25 Pursuant to the provisions of CCP §998 and CC §3291, if  
26 this offer is not accepted as provided therein, within 30  
27 days, plaintiff and intervenor will claim all benefits due  
28 thereunder.

DATED: January 5, 1983

Law Offices of  
BARRETT S. LITT

By: Michael S. Magnusson  
MICHAEL S. MAGNUSSON

Attorney for Intervenor  
Mary Sue Hubbard

By: John G. Peterson  
JOHN G. PETERSON

Attorney for Plaintiff  
Church of Scientology of  
California

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(VERIFICATION - 446 and 2015.5 C.C.P.)

STATE OF CALIFORNIA,

County of \_\_\_\_\_ } ss.

I, the undersigned, say: I am the \_\_\_\_\_

in the above entitled action; I have read the foregoing \_\_\_\_\_

and know the contents thereof; and that the same is true of my own knowledge, except as to the matters which are therein stated upon my information or belief, and as to those matters that I believe it to be true.

I certify (or declare) under penalty of perjury, that the foregoing is true and correct.

Executed on \_\_\_\_\_ (date) at \_\_\_\_\_ (place), California

(Signature)

(PROOF OF SERVICE BY MAIL - 1013a, 2015.5 C.C.P.)

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES } ss.

I am a resident of/employed in the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address/residence address is:

LAW OFFICES OF BARRETT S. LITT 617 So. Olive St., Ste.1000, LA, CA

On January 5, 1984, I served the within ITEMIZED LIST OF SPECIAL DAMAGES AND DEMAND FOR SETTLEMENT

on the parties in said action, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the

United States mail at Los Angeles, California addressed as follows:

Julia Dragojevic  
CONTOS & BUNCH  
5855 Topanga Canyon Blvd.  
Suite 400  
Woodland Hills, CA 91367

John Peterson  
PETERSON & BRYNAN  
8530 Wilshire Blvd.  
Suite 407  
Beverly Hills, CA 90211

I certify (or declare), under penalty of perjury,\* that the foregoing is true and correct.

Executed on January 5, 1984 (date) at Los Angeles (place), California

Signature

\*Both the verification and proof of service by mail forms, being signed under penalty of perjury, do not require notarisation.